

**UNITED STATES DISTRICT COURT
FOR THE WESTERN COURT OF VIRGINIA
Harrisonburg Division**

CLERKS OFFICE US DISTRICT COURT
AT HARRISONBURG, VA
FILED
07/11/2025
LAURA A. AUSTIN, CLERK
BY: /s/ Amy Fansler
DEPUTY CLERK

DARLA V. EDWARDS

Plaintiff

v.

JAMES MADISON UNIVERSITY

Civil Action No.: 5:23-cv-74

and

VIRGINIA ADVANCED STUDY

STRATEGIES DBA “VIRGINIA

EDUCATION STRATEGIES”

(“VES”)

and

JENNIFER STEVENS

Defendants

**NOTICE OF OBJECTION TO DEPOSITION PENDING RULING ON MOTION FOR
CONTINUANCE DUE TO MEDICAL HARDSHIP**

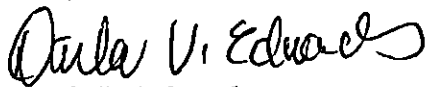
Plaintiff respectfully notifies the Court and opposing counsel that a Motion for Continuance Due to Medical Hardship is currently pending before the Court, and Plaintiff is awaiting a ruling on that motion. Despite this, opposing counsel has noticed a deposition of the Plaintiff, which places undue pressure on Plaintiff and may cause irreparable harm to her mental state.

Given the nature of the pending motion and medical documentation already submitted to the Court under seal, Plaintiff objects to proceeding with any deposition or discovery activities until the Court has issued a ruling.

This objection is made in good faith and solely for the purpose of protecting Plaintiff's health and due process rights. Plaintiff will comply fully with all discovery obligations following the Court's ruling.

Plaintiff respectfully requests that the Court clarify the status of the pending motion and confirm that no discovery proceedings, including depositions, should move forward until a ruling has been issued.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Darla V. Edwards", with a stylized flourish at the end.

Darla V. Edwards

July 10, 2025

CERTIFICATE OF SERVICE

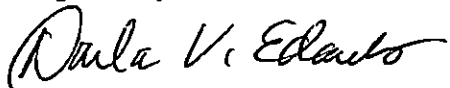
I hereby certify that on July 10, 2025, I caused a true and correct copy of the foregoing Notice of Objection to be served upon the following parties by certified mail:

McGuire Woods
800 E Canal St
Richmond, VA 23219
c/o – Heidi Siegmund

Shelley Cupp Schulte, PC
3 W Cary St.
Richmond, VA 23220
c/o Tim Schulte

James Madison University
800 S Main St
Harrisonburg, VA 22807
c/o Richard Shayegan

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Darla V. Edwards". The signature is fluid and cursive, with the first name "Darla" being the most prominent.

Darla V. Edwards